

**EXHIBIT 6**

(Plaintiff's Response and Brief in Opposition of Defendants' Motion for  
Summary Judgment)

HILL v. WONCH, ET AL

DEPOSITION OF VICKIE LYNN LARA

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION

RICHARD J. HILL,

Plaintiff,

v

JUSTIN WONCH, and  
TOWNSHIP OF FORSYTH,

Defendants.

US District Judge:  
HON. JANET T. NEFF

US Magistrate Judge:  
HON. MAARTEN VERMAAT

Case No. 2:19-cv-159

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DEPOSITION OF VICKIE LYNN LARA

Taken by the Defendants on the 18th day of February, 2020,  
at 1440 Ridge Street, Marquette, Michigan, at 1:00 p.m.

APPEARANCES:

For the Plaintiff: MR. PHILLIP B. TOUTANT (P72992)  
Numinen DeForge & Toutant PC  
105 Meeske Avenue  
Marquette, Michigan 49855  
(906) 226-2580

For the Defendants: MS. SUSAN DOUGLAS MacGREGOR (P41741)  
Kitch Drutchas Wagner Valitutti &  
Sherbrook PC  
1440 West Ridge Street, Suite C  
Marquette, Michigan 49855  
(906) 228-0001

Also Present: Justin Wonch

RECORDED BY: Pam Rankinen, CER 4532  
Certified Electronic Recorder  
Network Reporting Corporation  
Firm Registration Number 8151  
1-800-632-2720

Page 1

HILL v. WONCH, ET AL

DEPOSITION OF VICKIE LYNN LARA

1     **A**     **Yes.**

2                     MS. MacGREGOR:  Objection.

3     **Q**     And with his arms; right?  What was he doing?

4                     MS. MacGREGOR:  Object.  Let me state my objection  
5     before you do a compound question.  She didn't testify he  
6     was attacking Jack with his knee or that there were flying  
7     elbows.  Go ahead.

8     **Q**     Did it look like an attack to you?

9     **A**     **To me it was like roughhousing (indicating).  He was -- like**  
10    **he hurt him.**

11    **Q**     Was it scary?

12    **A**     **To me, yes, it was.**

13    **Q**     Were you afraid for Jack?

14    **A**     **Yes, I was.  At that point, yes, I was because I didn't**  
15    **think it was necessary for him to be put down the way he was**  
16    **put down.  And I didn't like how he was being rough handled.**  
17    **I didn't --**

18    **Q**     When you were saying roughhousing, you were swinging a fist.  
19     How was Officer Wonch striking Jack with his arms?

20    **A**     **Like this (indicating).  He kept going like this with his**  
21    **fist and forearms.**

22    **Q**     So this is fist to elbow as a plane?

23    **A**     **Yes.  And then he kept striking him the --**

24    **Q**     And what part of Jack's body was he doing that to?

25    **A**     **In the whole middle of his back.**

HILL v. WONCH, ET AL

DEPOSITION OF VICKIE LYNN LARA

1 Q So this right fist was being slammed into Mr. Hill's back?

2 A Rib cage -- like towards the back, yes.

3 Q Okay.

4 MS. MacGREGOR: The fist was?

5 Q How many times did that occur?

6 MS. MacGREGOR: Wait. Objection. His fist was  
7 going into the back?

8 THE WITNESS: Between his fist and this  
9 (indicating).

10 MS. MacGREGOR: His forearm?

11 THE WITNESS: His forearm and like this. He kept  
12 going like this.

13 MS. MacGREGOR: Okay. Thank you. Mr. Toutant  
14 tends to mischaracterize what you're saying.

15 MR. TOUTANT: No; no; no. That's not what I said.

16 MS. MacGREGOR: I think you were.

17 MR. TOUTANT: No; no, I actually think I have that  
18 right.

19 Q In terms of that motion that you were just describing, how  
20 many times did that occur to the best of your knowledge?  
21 Obviously, you know, I don't expect you to know because you  
22 were scared.

23 A I would say about four or five times.

24 Q Four to five times? Okay.

25 A From what I saw.